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Counsel to the Debtors and  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

-----X		
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., et al.,	:	Case No: 08-35653-KRH
	:	
	:	
Debtors.	:	Jointly Administered
-----X		

**STIPULATION AND ORDER**

Come now the Debtors and consent and stipulate as follows with respect to the Motion to Extend Time filed by Manufacturers & Traders Trust Company, as Trustee, on March 24, 2009:

1. The Debtors have filed several motions seeking authorization, pursuant to Bankruptcy Code Sections 105(a), 365(a) and 554 and Bankruptcy Rule 6006, to reject certain unexpired leases of non-residential real property and any guaranties thereof and to abandon

equipment, furniture or fixtures located therein, and this Court has granted such motions and entered orders approving such lease rejections.

2. In addition to the foregoing, pursuant to this Court's Order Under Bankruptcy Code Sections 105, 363 and 365 (I) Approving Bidding and Auction Procedures For Sale Of Unexpired Nonresidential Real Property Leases, (II) Setting Sale Hearing Dates, And (III) Authorizing And Approving (A) Sale Of Certain Nonresidential Real Property Leases Free And Clear Of All Interests, (B) Assumption And Assignment Of Certain Unexpired Nonresidential Real Property Leases And (C) Lease Rejection Procedures (the "February 19 Order"), the Debtors have given notices of their decision to reject certain other unexpired leases of real property.

3. Pursuant to Bankruptcy Rule 3002 the orders described in paragraph 1 above directed that rejection claims with respect to the leases rejected pursuant to such orders be filed within thirty days of the entry of the several orders.

4. Pursuant to Bankruptcy Rule 3002 the February 19 Order directed that rejection claims with respect to the leases rejected pursuant to such order be filed on or before April 30, 2009.

5. At the request of the counterparties to certain of the rejected leases, and to avoid confusion and possible inadvertent failure of a counterparty to file timely its proof of claim for rejection damages, the Debtors hereby stipulate and agree as follows:

All rejection damage claims with respect to leases rejected pursuant either to an order of this Court entered on or after March 1, 2009 and prior to April 1, 2009, authorizing the rejection of one or more unexpired leases of nonresidential real property or to a notice given prior to April 1, 2009, pursuant to this Court's February 19, 2009 Order shall be deemed timely filed if filed on or before April 30, 2009, regardless of whether or not April 30, 2009 is more than thirty days after the

applicable order is entered or the applicable notice given. Nothing herein shall be deemed to revive any already expired bar date.

Dated: March 24, 2009  
Richmond, Virginia

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Seen and agreed to:

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Seen and not objected to:

/s/ Paula S. Beran  
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Counsel to the Office Committee of  
Unsecured Creditors

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States Bankruptcy Judge

C E R T I F I C A T E

Pursuant to Local Bankruptcy Rule 9022-1(c), I hereby certify that the foregoing  
Stipulation and Order has been endorsed by all necessary parties.

/s/ Douglas M. Foley  
Douglas M. Foley

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